

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T'S TWENTY-EIGHTH SET OF INFORMATION
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

INFORMATION REQUESTS

- ATT-VZ 28-1 Refer to ATT-VZ 5-6 and Verizon's response thereto. Please supplement such response with all documents and information that were provided to the Federal Communications Commission in ("FCC") in response to the FCC's directive in Paragraph 31 of its June 26, 2001, *Order Designating Issues for Investigation*, in *In The Matter Of Bell Atlantic Telephone Companies Revisions In Tariff FCC Nos. 1 and 11*, CC Docket No. 01-140, relating to Transmittal Nos. 1373 and 1374 and Transmittal Nos. 23 and 24.
- ATT-VZ 28-2 Please provide the following engineering information for each of the fiber rings implemented in Massachusetts:
- a. The locations (wire centers or nodes) that the fiber ring passes through; and
 - b. The size of the fiber ring (in terms of fiber counts).
- ATT-VZ 28-3 Please provide the following engineering information documenting all of the SONET rings implemented in Massachusetts, including the following for each SONET ring:
- a. The locations of central offices where SONET nodes have been placed (*e.g.*, CLLI codes) to establish the SONET ring;
 - b. The speed of the SONET ring (OC3, OC12, OC48, OC192); and
 - c. whether the SONET ring is a two fiber or four fiber ring; and
 - d. whether the SONET ring is path switched or line switched.

Respectfully submitted,

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